

HPNS Technical Team Meeting Agenda
July 10, 2018, 1000-1100 PT

1. Welcome and check-in

Navy BRAC – Steve Banister, ~~Pat Brooks~~, Danielle Janda, Derek Robinson, ~~Thomas Macchiarella~~

Navy BRAC Consultants – Craig Bias, ~~Scott Hay~~, Kim Henderson, Kathy Higley, **Alex Lopez**

RASO – ~~Zach Edwards~~, Matt Liscio, ~~Matt Slack~~

EPA and consultants – Karla Brasaemle, ~~John Chesnut~~, Jana Dawson, Donna Getty, David Kappelman, ~~Jackie Lane~~, Lily Lee, ~~Lyndsey Nguyen~~

DTSC – Nina Bacey, ~~Janet Naito~~

CDPH – Sheetal Singh, Matt Wright

City (includes OCII/SFDPH and consultants) – Amy Brownell, Bob Burns, ~~Christina Rain~~, Shipman

Water Board – Tina Low, ~~David Tanouye~~

2. Parcel G and background soil work planning

- Draft work plans submitted to regulators and public 6/15
- Preliminary clarification questions and discussion based on technical review were as follows:
 - i. Sample sizes - Donna questioned the justification for sample sizes for both work plans. For background, she cannot locate the NUREG reference included in the work plan and indicated that more samples may be needed. The NUREG reference can be provided and the 5 background areas (4 onsite and 1 offsite) are relatively small in size. The offsite area is intended as an undisturbed area to evaluate surface soil concentrations indicative of fallout. Clarification was requested on whether the population from TUs will be compared to background and the plan is to compare TU data to the average background plus the RG. For Parcel G, the sample size of 18 is based on how the work was previously done.
 - ii. Investigation levels - Jana asked if the investigation levels will vary by SU and why; however, that was not intended and will be clarified in the work plan if needed. The Team discussed the low investigation levels and if/how they will be met. The MDC calculations based on use of large volume sodium iodide crystals, size, and uniform content can be provided to facilitate work plan review if needed. Additionally, use of the 186 keV peak was questioned. For Ra-226, both the 186 and 609 keV peaks would be used and ultimately, decisions would be made based on the 609 keV peak and this can be clarified in the work plan. For Cs-137, the gamma scan surveys cannot detect Cs-137 at the RG which has always been an issue and decisions are then based on the soil sample results. Jana asked if a separate task-specific plan will be provided. Once a contractor is selected, they will prepare addendums to the work plan and SAP, if needed, for submittal for regulatory review.
 - iii. Background
 - 1. Jana asked if the plan is to use historical background data and the new data. The plan is to only use the new data.

2. Jana questioned the background data comparison in Section 5.5 if the full U-238 analysis is planned. Full suite analysis is planned for the background data to enable equilibrium evaluation. If full suite analysis is not planned for the TU data, Jana questioned how the equilibrium evaluation would be conducted. Jana asked how outliers will be evaluated and whether U-238 equilibrium will be evaluated prior to the outlier test. She also questioned the use of parametric vs. non-parametric tests and which would be more appropriate. This can be discussed further at the meeting next week.
 3. Matt W. asked for clarification on the background reference area locations and size. They are the same areas as previously but smaller in size within the previous areas, to allow for all the areas to equate to the same size. This can be clarified in the work plan.
 4. Matt W. requested clarification that the U-238 will be used to evaluate NORM. Because of the Ra-226 variability and the potential to be above the RG and BG, NORM analysis is planned to provide using U-238 for accuracy.
- iv. Gamma scanning – For Phase 2 TU surveys, Jana indicated that the work plan does not provide gamma scan details and questioned whether the same trigger level for sampling will be used. Only scanning of the borings is planned as part of Phase 2 and it is intended for the same trigger level to be used as for Phase 1. At least 3 samples will be collected from each core and scanned. Lily indicated that the work plan states that this will only be the case if borings are less than 4-feet and this was a typo that will need to be corrected.
 - v. Over excavation - Matt W. asked whether the open trench would be scanned after the original TU soil is excavated and then over excavated. The over excavated soil is intended to be representative of the sidewalls and floor and will be scanned ex situ; therefore, the open trench would not be scanned.
- Lily provided questions and bigger picture process comments that were discussed as follows:
 - i. Regulatory and public comments – Lily questioned the next steps. Comprehensive RTCs will be prepared and if needed, a redline version of the work plan can be provided for regulatory backcheck. Because the work plan is not a primary document, a draft final is not required. No public comments have been received to-date.
 - ii. Approach - Lily indicated that per their March 26 recommendations, investigation of 33% of the trenches was recommended and if there was an exceedance, 100% excavation would be needed. EPA's biggest concern is that the draft work plan does not include this. On the last call, Danielle explained that based on higher level management discussions, the plan is to conduct the investigation first, evaluate the results, and if concentrations are above the RGs, a report will be prepared with recommendations for follow-on actions. Lily discussed the approach with John and there may be misinterpretation and has raised this with EPA management and they are having a meeting to discuss further. Amy asked whether EPA has considered the trigger level in concept to this issue where if thousands of samples are below the RG and 1 exceeds whether this actually requires 100% excavation to be protective. EPA has discussed this and Donna indicated to achieve 95% confidence, 100% of samples

within the 33% of TUs would need to be clean. The number of samples per TU needs to be factored into this and agreed on prior to the work.

iii. 30-day regulatory comment period

1. Meeting 7/17 to discuss comments, 1:00-3:00 PM PT at EPA's office in San Francisco

- a. Lily indicated EPA will have a lot of comments and will have a draft of written comments prior to the meeting but will hold them for submittal until after the meeting as requested. In the meantime, clarifying questions can be sent to Danielle, Pat, and Kim.
- b. The Navy is still discussing the agenda but likely, since managers (Lawrence, Angeles, and John) will attend, higher level policy comments will be discussed first and then technical details can be discussed as time allows.

iv. 60-day public comment period (ends 8/14)

- Updating SAP to reflect the Parcel G and background soil activities – pre-draft planned for submittal to Navy 7/20

3. Findings reports

- Pending Navy review of RTCs and draft final
 - i. Parcels B and G Soil
 - ii. Parcels D-2, UC-1, UC-2, and UC-3 Soil
- Pending EPA comments
 - i. Buildings
 - ii. Parcel C Soil
 - iii. Parcel E Soil

4. Future calls

- 7/17/18, 1000-1100 PT status call – cancel based on work plan meeting
- 8/7/18, 1000-1100 PT status call